

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS**

WENDY NEWCOMB, *on behalf of herself  
and all others similarly situated,*

Plaintiff,

v.

EXPERIAN INFORMATION SOLUTIONS,  
INC.,

Defendant.

Case No. 4:17-cv-11793-TSH

**STIPULATION OF DISMISSAL**

Pursuant to Fed. R. Civ. P. 41(a)(1)(A)(ii), Plaintiff Wendy Newcomb (“Plaintiff”) and Defendant Experian Information Solutions, Inc. (“Defendant”), by and through their counsel, hereby stipulate and agree to the dismissal with prejudice of the above-captioned action, with each party to bear their own fees and costs.

Dated: April 22, 2019

BERGER MONTAGUE PC

BY: /s/ John G. Albanese  
John G. Albanese (*pro hac vice*)  
E. Michelle Drake (*pro hac vice*)  
43 SE Main Street, Suite 505  
Minneapolis, MN 55414  
Tel. 612.594.5999  
Fax 612.584.4470  
jalbanese@bm.net  
emdrake@bm.net

KEHOE LAW FIRM, P.C.  
Michael K. Yarnoff (*pro hac vice*)  
Two Penn Center Plaza  
1500 JFK Blvd., Suite 1020

Respectfully submitted,

JONES DAY

BY: /s/Laura Diss Gradel  
Christopher M. Morrison  
(BBO# 651335)  
Laura Diss Gradel (BBO #692315)  
100 High Street, 21st Floor  
Boston, MA 02110-1781  
Tel. 617.960.3939  
Fax 617.449.6999  
cmorrison@jonesday.com  
lgradel@jonesday.com  
*Attorneys for Defendant Experian  
Info. Sols., Inc.*

Philadelphia, PA 19102  
Tel. 215.792.6676  
myarnoff@kehoelawfirm.com

LICHTEN & LISS-RIORDAN, P.C.  
Harold L. Lichten (BBO #549689)  
729 Boylston Street, Suite 2000  
Boston, MA 02116  
Tel. 617.994.5800  
hlichten@llrlaw.com  
*Attorneys for Plaintiff Newcomb*

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that a true and correct copy of the foregoing Stipulation was electronically filed with the Court on April 22, 2019 and is available for viewing and downloading from the ECF system. All counsel of record were served via electronic notification.

Date: April 22, 2019

/s/John G. Albanese  
John G. Albanese (*pro hac vice*)